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FILED
U.S. DISTRICT COURT

2018 JAN -3 P 1:32

DISTRICT OF UTAH

BY:

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRAVIS LUKE DOMINGUEZ,

Defendant.

2:18-cr-9 RJS

INDICTMENT

VIO. 18 U.S.C. § 844(e),
Maliciously conveying false
information; 18 U.S.C. § 871, Threat
against the President; and 18 U.S.C.
§ 875(c), Threatening interstate
communication.

The Grand Jury charges:

COUNT 1

(18 U.S.C. § 844(e))

(Maliciously conveying false information)

On or about November 13, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

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Maliciously conveying false
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against the President; and 18 U.S.C.
§ 875(c), Threatening interstate
communication.

The Grand Jury charges:

COUNT 1
(18 U.S.C. § 844(e))
(Maliciously conveying false information)

On or about November 13, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

attending the Megaplex Movie Theater, 3751 W. Parkway Plaza Drive, South Jordan, Utah, by means of an explosive; all in violation of Title 18, United States Code, Section 844(e).

COUNT 4
(18 U.S.C. § 844(e))
(Maliciously conveying false information)

On or about November 28, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, through the use of an instrument of interstate and foreign commerce, namely the internet, maliciously conveyed false information knowing the same to be false concerning an alleged attempt to unlawfully damage and destroy a building, namely the Chase Bank, 10620 South State Street, Sandy, Utah, by means of an explosive; all in violation of Title 18, United States Code, Section 844(e).

COUNT 5
(18 U.S.C. § 871)
(Threat against the President)

On or about December 4, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully make a threat to take the life of the President of the United States, specifically, "I'm a Navy Seal... I woke up and decided going to kill the president Donald Trump today. Please forgive me and then I will die by suicide by cop;" all in violation of 18 U.S.C. § 871.

COUNT 6
(18 U.S.C. § 871)
(Threat against the President)

On or about December 4, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully make a threat to take the life of the President of the United States, specifically, "I'm going to kill the sexist racist homophobic President Trump today. Nothing you can do to save President Trump nor stop me pigs;" all in violation of 18 U.S.C. § 871.

COUNT 7
(18 U.S.C. § 875(c))
(Threat to injure another)

On or about December 4, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully transmit via the internet a communication to Unified Police Department of Greater Salt Lake, Utah, Web Tipster and the communication contained a threat to injure police officers if they tried to stop him from killing the President of the United States; all in violation of 18 U.S.C. § 875(c).

COUNT 8
(18 U.S.C. § 875(c))
(Threat to injure another)

On or about December 16, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully transmit via the internet a communication to the Unified Police Department of Greater Salt Lake, Utah, Web

Tipster and the communication contained a threat to injure individuals attending the Megaplex Movie Theater, 3751 W. Parkway Plaza Drive, South Jordan, Utah; all in violation of 18 U.S.C. § 875(c).

COUNT 9
(18 U.S.C. § 875(c))
(Threat to injure another)

On or about December 24, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully transmit via the internet a communication to the Unified Police Department of Greater Salt Lake, Utah, Web Tipster and the communication contained a threat to injure individuals attending the Megaplex Movie Theater, 3751 W. Parkway Plaza Drive, South Jordan, Utah; all in violation of 18 U.S.C. § 875(c).

COUNT 10
(18 U.S.C. § 875(c))
(Threat to injure another)

On or about December 31, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, did knowingly and willfully transmit via the internet a communication to the Unified Police Department of Greater Salt Lake, Utah, Web Tipster and the communication contained a threat to injure individuals attending the Megaplex Movie Theater, 3751 W. Parkway Plaza Drive, South Jordan, Utah, and police officers responding to the shootings; all in violation of 18 U.S.C. § 875(c).

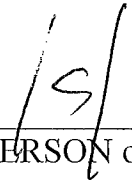
COUNT 11
(18 U.S.C. § 844(e))
(Maliciously conveying false information)

On or about December 31, 2017, in the Central Division of the District of Utah,

TRAVIS LUKE DOMINGUEZ,

the defendant herein, through the use of an instrument of interstate and foreign commerce, namely the internet, maliciously conveyed false information knowing the same to be false concerning an alleged attempt to kill, injure, and intimidate individuals attending the Megaplex Movie Theater, 3751 W. Parkway Plaza Drive, South Jordan, Utah, by means of an explosive; all in violation of Title 18, United States Code, Section 844(e).

A TRUE BILL:



FOREPERSON of the GRAND JURY

JOHN W. HUBER
United States Attorney



MARK K. VINCENT
Assistant United States Attorney